

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CRYSTAL MCKINNEY,

Plaintiff,

-against-

SEAN COMBS a/k/a “P. DIDDY,” BAD BOY
ENTERTAINMENT LLC d/b/a BAD BOY RECORDS,
BAD BOY ENTERTAINMENT HOLDINGS, INC., SEAN
JOHN CLOTHING LLC, and DADDY’S HOUSE
RECORDINGS, INC.,

Defendants.
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Case No.: 24-cv-03931

**DECLARATION OF
MICHELLE A. CAIOLA IN
SUPPORT OF PLAINTIFF’S
OPPOSITION TO
DEFENDANTS’ MOTION
TO DISMISS**

MICHELLE A. CAIOLA, ESQ., declares, pursuant to 28 U.S.C. § 1746 and subject to the penalties of perjury, that the following is true and correct:

1. I am a member of the Bar of this Court and am a Partner at the firm of Phillips & Associates, Attorneys at Law, PLLC, attorneys for Plaintiff, in the above-captioned action. As such, I am familiar with all of the facts and circumstances in this action.
2. I submit this declaration in support of Plaintiff’s Memorandum of Law in Opposition to Defendant’s Motion to Dismiss
3. Annexed hereto is “Exhibit A”, a true and correct copy of an affidavit filed by New York State Senator Brad Hoylman in *Doe v. Black*, 1:23-cv-06418.
4. Annexed hereto is “Exhibit B”, a true and correct copy of the New York City, Local Law Report No. 0752-2000 (2000).
5. Annexed hereto is “Exhibit C”, a true and correct copy of the New York City, Local Law Report No. 2372-2021 (2021)

6. Annexed hereto is “Exhibit D”, a true and correct copy of written testimony submitted before the New York City Council Committee on Women and Gender Equity in support of New York City, Local Law No. 2372-2021 (2021) on November 29, 2021.

WHEREFORE, it is respectfully requested that Defendants’ motion be denied in its entirety along with such other further relief as the Court deems just and proper.

Dated: New York, New York
December 6, 2024

Respectfully Submitted,

**PHILLIPS & ASSOCIATES,
ATTORNEYS AT LAW PLLC**



Michelle A. Caiola, Esq.
Jonathan Goldhirsch, Esq.
Attorneys for Plaintiff
45 Broadway, 28th Floor
New York, New York 10006
(212) 248-7431
mcaiola@tpglaws.com
jgoldhirsch@tpglaws.com